October 23, 2006

Office of General Counsel Federal Election Commission 999 E Street NW Washington, DC 20463

MUR# 5862

Formal Complaint Regarding Friends of Joe Lieberman (Committee ID C00235515)

Dear General Counsel

RE

RECEIVED
FEDERAL ELECTION:
COMMISSION
OFFICE OF GENERAL
COUNSEL

Please accept this letter as a formal complaint regarding the apparent violation of Title 11 of the Code of Federal Regulations, section 102 11, by the Friends of Joe Lieberman committee, and Joseph I Lieberman, individually As set forth more fully below, the Lieberman committee has failed to account for more than \$387,000 00 in supposed petty cash expenditures in violation of 11 C F R §102 11 On behalf of the citizens of Connecticut and all federal taxpayers, it is hereby alleged

Title 11 CFR §102 11 (2 U S C 432(h)(2)) (Petty Cash Fund) provides

A political committee may maintain a petty cash fund out of which it may make expenditures not in excess of \$100 to any person per purchase or transaction if a petty cash fund is maintained, it shall be the duty of the treasurer of the political committee to keep and maintain a written journal of all disbursements. This written journal shall include the name and address of every person to whom any disbursement is made, as well as the date, amount, and purpose of such disbursement. In addition, if any disbursement is made for a candidate, the journal shall include the name of that candidate and the office (including State and Congressional district) sought by such candidate.

The Friends of Joe Lieberman committee, and Joseph I Lieberman, individually have violated the clear and unambiguous terms of 11 C F R §102 11 in at least the following three ways

First, according to the FEC October Quarterly report filed on October 13, 2006, the Lieberman campaign has petty cash disbursements amounting to \$387,561 00, which is roughly 8 percent of its total disbursements, or one out of every twelve dollars spent On several occasions, petty cash disbursements greater than \$100 were reported, as supposed payment for "volunteers" As summary of these disbursements from the Friends of Joe Lieberman report is attached hereto. These disbursements reflect patent violations of 11 C F R. §102 11

Second, the report does not include the name and address of every person to whom any disbursement is made, as well as the date, amount, and purpose of such disbursement. Again, Friends of Joe Lieberman stands in clear violation of 11 C F R §102 11

Third, and perhaps most troubling, the Associated Press reported earlier today that Lieberman spokeswoman Tammy Sun claims the cash was supposedly used pay to field coordinators who then distributed money to workers who were canvassing (Andrew Miga, Lamont Questions Lieberman's Spending, October 23, 2006) There is no evidence that the Lieberman committee kept and maintained a written journal of any kind regarding these disbursements as required by 11 C F R §102 11 As I am sure you are aware, the rationale for this regulation is to, among other things, prevent the creation and utilization of slush funds for illicit purposes. The \$387,561 00 involved here is a sum of supposed petty cash expenditures unprecedented in any race in our state's history. The Lieberman campaign's patent disregard for this regulation calls for the immediate investigation of this matter by your office to ensure that the voters of Connecticut can be fairly informed about the conduct of their elected officials.

I would appreciate you contacting me to confirm receipt of this complaint

I thank you in advance for your attention to this pressing matter

Sincerely 100%

Thomas Swan

300 Research Parkway, Suite 102 Menden, CT 06450

Subscribed and sworn to by [users name] before me on [users date], in [venue] County, Connecticut

Signature of notary withis. F. Wicham

Printed name of notary Cynthia F Granam

County of Commission New Itaven

Commission Expiration Date

CYNTHIA F. GRAHAM HOTARY PUBLIC MYCOMMON EFFERAPR 21, 2011 To: Alva Dejarnatt-niller

Fax number: 20 2 - 2/9-3923

Date: 10/27/06

Ned Lamont for Senate

: :

Headquarters
300 Research Parkway
Suite 102

Phone: 203-634-6601
Fax: 203-634-6883

Regarding: Joe Lieberna- FEC complaint Affachment

Comments: Here are the relevant pases
\$387,561 in Petty Cash

14 pages (incl. cover. sheet)

COUNSEL .

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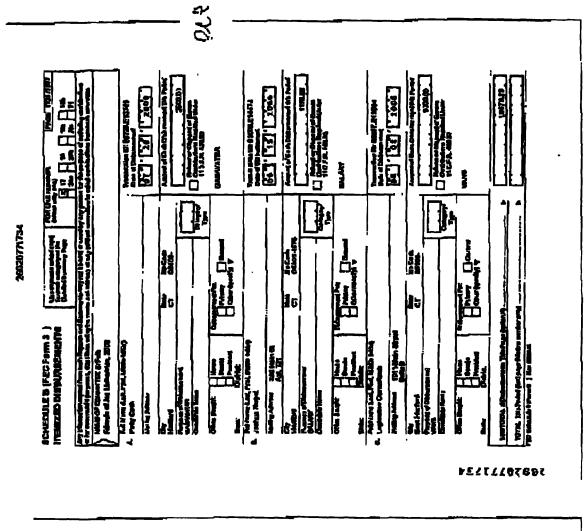
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